

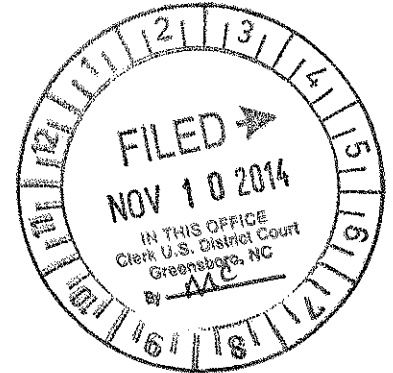
IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

v.

AARON SCOTT BATTLE,  
Defendant,

1:98CR322-3



MOTION TO REDUCE SENTENCE PURSUANT TO 18 U.S.C.  
SECTION 3582(c)(2) AND UNITED STATES SENTENCING GUIDELINE  
AMENDMENT 782

NOW COMES THE PETITIONER, AARON SCOTT BATTLE, PRO SE,  
AND SHOWS THE COURT AS FOLLOWS:

1. The Petitioner Aaron Scott Battle pled guilty to conspiracy to distribute in excess of 50 grams of crack, and was sentenced on December 3, 1999 to a base level of 37 (after acceptance of responsibility), a criminal history category of IV, and a guideline range of 292-365 months.

Petitioner was sentenced at the low-end of the advisory guideline range to a term of 292 months.

2. In July of 2011, Petitioner's sentence was reduced to a term of 235 months based on a motion pursuant to 18 U.S.C. 3582(c)(2) and the retroactive application of Amendment 706.

3. In light of Amendment 782 and its retroactive application, petitioner is eligible to be resentenced to a total offense level of 33, and a criminal category of IV for an advisory guideline range of 188-235 months.

4. With respect to 3553(a) factors, petitioner has completed various educational courses: (See Exhibit A. Inmate Education Data Transcript). Petitioner has participated in youth outreach and inmate mentorship programs, completed a drug education course and continues to assist inmates in an effort to be instrumental in the rehabilitation of others: (See Exhibits B-C FBOP Memorandums pertaining to petitioner's participation in Youth Outreach and Inmate Mentorship Programs). And after more than 15 years of incarceration, employment has been offered to and made available for petitioner upon his release: (See Exhibit D. Consulting & Coaching Services / Letter of Intent to Hire).

5. Petitioner humbly request that the Court consider the above post-sentencing conduct and rehabilitative efforts when exercising its discretion to grant a 2-point reduction from the current offense level of 35 to 33, criminal history category of IV, and resentence petitioner to the low-end of the advisory guideline of 188-235 months.

6. Wherefore, in light of the unique circumstances regarding 18 U.S.C. 3582(c)(2), which does not preclude the Court from entering orders under 18 U.S.C. 3582(c)(2) before November 1, 2015, petitioner prays that the Court will immediately address this petition so as to allow for his Unit-Team at FCI Danbury to arrange for petitioner to be transferred to a Community Custody Facility pursuant to 18 U.S.C. 3624(c), which will afford petitioner a reasonable opportunity to adjust to and prepare for his reentry into the community.

Respectfully submitted,

Aaron Scott Battle  
Aaron Scott Battle

CERTIFICATE OF SERVICE

THIS CERTIFIES THAT I served a true and correct copy of  
this Motion For Reduction of Sentence pursuant to 18 U.S.C.  
3582(c)(2), including attached Exhibits A and B-D to the  
following party on this 4 day of November, 2014 via U.S. Mail:

OFFICE OF THE CLERK  
UNITED STATES DISTRICT COURT  
P.O. BOX 2708  
Greensboro, NC 27402

Respectfully submitted,

Aaron Scott Battle  
Aaron Scott Battle

EXHIBIT A

DANCW \*  
PAGE 001 OF 001 \*

INMATE EDUCATION DATA  
TRANSCRIPT

\* 10-29-2014  
\* 10:12:41

REGISTER NO: 20070-057 NAME.: BATTLE  
FORMAT.....: TRANSCRIPT RSP OF: DAN-DANBURY FCI

FUNC: PRT

----- EDUCATION INFORMATION -----

FACL	ASSIGNMENT DESCRIPTION	START DATE/TIME	STOP DATE/TIME
DAN	ESL HAS ENGLISH PROFICIENT	05-18-2003 1352	CURRENT
DAN	GED HAS COMPLETED GED OR HS DIPLOMA	05-18-2003 1352	CURRENT

----- EDUCATION COURSES -----

SUB-FACL	DESCRIPTION	START DATE	STOP DATE	EVNT	AC	LV	HRS
DAN M	RPP1 - NUTRITION	08-27-2014	10-01-2014	P	C	P	2
DAN M	INTRODUCTION TO POETRY	08-26-2014	09-24-2014	P	C	P	16
DAN M	ACE CLASS INTERPERSONAL COMMUN	07-03-2014	08-20-2014	P	C	P	16
DAN M	RPP5-RELEASE REQUIREMENTS-USPO	07-23-2014	07-23-2014	P	C	P	2
DAN M	RPP4-COMM RESOURCES CCM	07-23-2014	07-23-2014	P	C	P	2
FTD GP	BRIDGES TO SUCCESS-COPING	12-02-2013	02-10-2014	P	C	P	30
FTD GP	SCORE-BUS DEVELOPMENT COURSE	01-08-2014	01-29-2014	P	C	P	20
FTD GP	BLACK HISTORY MNTH CLASS	01-06-2014	03-30-2014	P	C	P	24
FTD GP	COMPUTER SKILLS VT-7:30-9:00AM	10-21-2013	02-07-2014	P	C	M	105
FTD GP	LIFE CHOICES, CONSEQU., CHANGE	10-31-2013	01-15-2014	P	C	P	25
BUF	LEGAL RESEARCH	01-07-2013	03-07-2013	P	C	P	16
BUF	DAP-EACH ONE REACH ONE MENTOR	02-22-2012	10-17-2012	P	C	P	21
BUF	DAP-EACH ONE REACH ONE MENTOR	08-30-2011	10-17-2012	P	C	P	8
BUF	DAY CLASS FOR DRUG EDUCATION	01-11-2012	01-31-2012	P	C	P	12
BUF	MEINEKE INDEP. STUDY (OPEN)	05-09-2011	06-16-2011	P	C	P	30
BUF	MUSIC & SPORT INDUSTRY MGMT.	03-02-2011	04-20-2011	P	C	P	16
BUF	ENTREPRENEURSHIP SAT 230-330	07-13-2010	08-31-2010	P	C	P	24
BUF	MATH 60 MW 530P-830P	01-08-2009	05-12-2009	P	C	P	78
BUF	MEN IN TRANSITION FRI 630-730	01-06-2009	03-04-2009	P	C	P	7
BUF	SMART MONEY GROUP	05-20-2007	06-19-2008	C	C	P	30
BUF	HOW TO ST A SM BUS TTH 530-830	05-20-2008	06-27-2008	P	C	P	35
BTF GP	SMART MONEY 12:30-3:30 F	03-11-2008	04-24-2008	P	C	P	30
BTF GP	KEYBOARDING CLASS TT 1230-330	02-12-2008	03-20-2008	P	C	P	35
BTF GP	SURVIVAL SKILLS (PARENTING)	02-04-2008	03-20-2008	P	C	P	33
BTF GP	BEGINNING SPANISH M-T 230	09-10-2007	12-17-2007	P	C	P	40
BTF GP	HEALTHFAIR 1200-1400 JULY 11	07-11-2007	07-12-2007	P	C	P	2
CUM	WHERE IN THE WORLD	06-30-2005	08-25-2005	P	C	P	18
CUM	WRITING & PUBLISHING WORKSHOP	01-24-2005	03-11-2005	P	C	P	20
ASH	BLACK HISTORY	06-07-2004	08-09-2004	P	C	P	12
ASH	TYPING II FCI	04-22-2004	06-24-2004	P	C	P	16
ASH	INTRODUCTORY TYPING CLASS	01-26-2004	04-08-2004	P	C	P	18
DEV LOW	(PG) HISTORY OF JUNETEENTH	06-18-2003	06-19-2003	P	C	P	4

G0000

TRANSACTION SUCCESSFULLY COMPLETED

EXHIBITS B-C



UNITED STATES GOVERNMENT  
**memorandum**  
Federal Bureau of Prisons  
Low Security Correctional Institution

*D. Carter*

MEMORANDUM FOR D. CARTER, VANCE UNIT MANAGER

From: B. Barnes, Correctional Counselor  
N. Jefferson, Correctional Counselor

*[Handwritten signature]*

Subj: Inmate: BATTLE, AARON  
Register No: 20070-057

On behalf of the LSCI-Butner Back-On-Track program, I would like to extend the program thanks and appreciation to inmate Battle. The Back-On-Track program is a youth outreach program designed to shed light on decision making, past conduct and a combination of bad choices that can lead to incarceration. Inmate Battle was selected for the Back-On-Track program out of 1300 inmates. All participants are screened and selected by program board members. Participants are selected by criteria involving, institutional adjustment, inmate character, inmate programs participation and stimulation of the youth involved. The institution program is well received by the community, staff members and institutional executive staff. The program has resulted in approximately over 600 youth participants.



UNITED STATES GOVERNMENT  
M E M O R A N D U M

Federal Bureau of Prisons  
Federal Correctional Complex  
Butner, North Carolina

Date: February 15, 2012

Reply to  
Attn Of:

*B. Forby*  
B. Forby, PhD  
Drug Treatment Specialist

To: Case Manager

Subject: Each One Reach One - Inmate Mentorship Program

Inmate: Aaron Battle (20070-057)

Unit: Vance A

This inmate is currently serving as a mentor in the above-mentioned program. Individuals in this program have expressed an interest in making a positive difference, helping inmates make positive changes in their lives, creating a positive climate in the institution, and increasing effective communication and social skills. They have been inducted after a rigorous selection and training process, which includes maintaining clear conduct for one year, successful involvement in some type of programming, such as Psychology groups, Education classes, Religious services, Recreation activities, etc., recommendation by all Unit Staff and work supervisors, recommendation by a current Mentor, and willingness to attend weekly training sessions.

The following comments have been offered by Unit and Unicorn Staff who have attended Mentor presentations and have interacted with current mentors:

"Thank you for the invitation. I think there were seven of the men that work for me in the program, and I am very proud of them all. If you ever need any additional help with the program, please feel free to call me."

"I believe this is a great program and find it very encouraging that these guys want to help people. That alone shows that change is possible and that they themselves believe that."

"Thanks for having us. This is a program we all believe in and we want to support those guys the best we can!"

"Please pass on to your mentors for an outstanding job. This is a terrific program and I plan to support and encourage my inmates to become involved."

The Each One Reach One Program comprises a group of highly positive, motivated individuals who desire to serve their community, maintain a maximum level of positive purpose and social service, and work to transform the climate of LSCI Butner.

Mr. Battle has participated in 22 hours of mentor training and has consistent involvement in the program. He has been instrumental in providing solutions and creative ideas for the mentor program as well as coaching and assisting inmates who are struggling. He has also pursued special knowledge about drug abuse in the Freedom from Drugs program to be of further assistance to addicted individuals. He has been, overall, a positive influence in the Low Security Correctional Institution.



**EXHIBIT D**

# K.L.M Consulting & Coaching Services

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PROGRAM COORDINATION • QUALITY MANAGEMENT & ASSURANCE • CUSTOMER SERVICE

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"The stone that the builder refused . . . Will always be the head cornerstone."

Ms. Keshea Montgomery  
2406 Pineview Drive  
Greensboro, NC 27407

October 14, 2014

Judge N. Carlton Tilley Jr. US District Court  
Middle District of North Carolina  
324 West market Street, Suite 1 Greensboro, NC 27401- 2513

Re: US v Aaron Battle, 98-cr- 322-NCT-3

Dear Judge Tilley,

My name is Keshea Montgomery. I am writing to provide information that I believe is relevant to the disposition of the Motion filed on behalf of the defendant, Aaron Battle, which seeks a sentence reduction based on retroactive changes to the Sentencing Guidelines.

I am a friend of the Battle family and have known Aaron for approximately 20 years. During his incarceration, I have maintained contact with Aaron and even visited him in prison. He is a decent human being, whom, although committed crimes more than 15 years ago, is remorseful and has utilized his time in prison positively by participating in rehabilitative programs, such as Youth Outreach, Inmate Mentor, and Drug Education. Aside from being a family friend, I am the owner of K.L.M Consulting & Coaching Services.

Having tracked Aaron's positive progress over the years with his programming and rehabilitative efforts, I have decided to offer him employment upon his release. K.L.M Consulting & Coaching Services works with various Mental/Behavioral Health agencies. The position I have available for Aaron is to be my assistant. He would help me with in the following areas: Policy & Procedures, Accreditation & Endorsements, Audit Services, Form Development, Program Coordination, Quality Management & Assurance and finally, Mental Health Counseling.

Given Aaron's broad knowledge, life experience, and his rehabilitate efforts over the last 15 years, I believe he will be a valuable asset to my team. He can offer insight to the many target populations I service, especially the male youth groups which I work with through EMBODI (Empowering Males to Build Opportunities for Developing Independence). This program is designed to refocus the efforts of Delta Sigma Theta Sorority, Inc., with the support and action of other major organizations, on the plight of African-American males. Both informal and empirical data suggests that the vast majority of African-American males continues to be in crisis and is not reaching its fullest potential educationally, socially and emotionally. EMBODI is designed to address these issues through dialogue and

• Greensboro, NC 27407 • 336-505-9605 (P) • 888.371.6387 (F) • [www.klmconsulting.org](http://www.klmconsulting.org)

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recommendations for change and action. EMBODI addresses issues related to STEM education, culture, self-efficacy, leadership, physical and mental health, healthy lifestyles choices, character, ethics, relationships, college readiness, fiscal management, civic engagement and service learning.

I understand that gainful employment is so very important to Society's goal of reducing recidivism for ex-offenders upon release. As such, I wanted Your Honor to know that Aaron already has a job waiting for him in a field which he enjoys and opportunities to give back to his community while allowing other young men to learn from his experiences. I truly believe "It Take a Village" to make a difference in the lives of the many persons we help through K.L.M Consulting & Coaching Services.

To the extent the Court has any questions whatsoever, or needs any additional information that it believes relevant to the decision as to whether to reduce Aaron's sentence, I will provide the same upon request. Lastly, the Court can view the services my company provides at <http://www.klmconsulting.org/>.

I thank the Court and hope the information provided herein is fully considered in the very important decision it will make in the case.

Thank you in advance for your consideration.

Sincerely,

*Ms. Keshea Montgomery*  
Ms. Keshea Montgomery

Keshea L. Montgomery, C.C., CSAC-I  
K.L.M Consulting & Coaching Services  
Adolescent & Adult MH/IDD/SA  
Phone: (336)505-9605; Fax: (888)371-6387  
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<http://www.klmconsulting.org>



*"The happiest people do not have the best of everything . . . They make the best of everything they have!"*